

**Hearing Date: To be determined**  
**Objections Deadline: To be determined**

GROOM LAW GROUP, CHARTERED  
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Special Employee Benefits Counsel for Debtors and Debtors In Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	<b>: Chapter 11</b>
<b>DELPHI CORPORATION, <u>et al.</u>,</b>	<b>: Case No. 05-44481 (RDD)</b>
<b>Debtors.</b>	<b>: (Jointly Administered)</b>
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**NOTICE OF FINAL FEE APPLICATION OF GROOM LAW GROUP, CHARTERED,  
AS SPECIAL EMPLOYEE BENEFITS COUNSEL FOR THE DEBTORS, SEEKING  
ALLOWANCE OF COMPENSATION FOR  
PROFESSIONAL SERVICES RENDERED AND FOR REIMBURSEMENT OF  
ACTUAL AND NECESSARY EXPENSES INCURRED FROM  
OCTOBER 8, 2005 THROUGH JANUARY 25, 2008**

PLEASE TAKE NOTICE that on January 4, 2010, Groom Law Group, Chartered ("Groom") filed the Final Fee Application of Groom Law Group, Chartered, as Special Employee Benefits Counsel for the Debtors, Seeking Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from October 8, 2005 through January 25, 2008 (the "Final Fee Application").

PLEASE TAKE FURTHER NOTICE that a hearing to consider approval of Groom's Final Fee Application will be held on a date to be determined by the Court (the "Hearing") before the Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 610, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that responses to Groom's Final Fee Application, if any, must (a) be in writing, (b) conform to all applicable Rules and Orders, (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court's case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Documents Format (PDF), Word Perfect, or any other Windows-based word processing format, (d) be submitted in hard copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Court Judge, and (e) be served upon (i) Groom Law Group, Chartered, 1701 Pennsylvania Avenue, NW, Washington, D.C. 20006 (Att'n: Lonie A. Hassel, Esq.), (ii) Delphi Corporation, 5725 Delphi Drive, Troy Michigan 48098 (Att'n: David M. Sherbin, Vice President and General Counsel), (iii) counsel to the Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 155 N. Wacker Drive, Suite 2700, Chicago, Illinois 60606 (Att'n: John Wm. Butler, Jr.), (iv) counsel for the agent under the Debtors' prepetition credit facility, Simpson Thacher & Bartlett LLP, 425 Lexington Avenue, New York, New York 10017 (Att'n: Kenneth S. Ziman and Marissa Wesley), (v) counsel for the agent under the postpetition credit facility, Davis Polk & Wardwell, 450 Lexington Avenue, New York, New York 10017 (Att'n: Marlane Melican), (vi) counsel for the Official Committee of Unsecured Creditors, Latham & Watkins LLP, 885 Third Avenue, New York, New York 10022 (Att'n: Robert J. Rosenberg and Mark A. Broude), (vii) counsel for the Committee of Equity Security Holders, Fried, Frank, Harris, Shriver & Jacobson, LLP, One New York Plaza, New York, New York 10004 (Att'n: Bonnie Steingart), (viii) the following members of the Joint Fee Review Committee: Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Att'n: John D. Sheehan, Vice President & Chief Restructuring Officer) and GE Plastics, Americas, 9930 Kincey Avenue, Huntersville, NC 28078 (Att'n: Valerie Venable, Credit

Manager), and (ix) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New York 10004 (Att'n: Brian Masumoto), in each case so as to be **received** no later than **4:00 P.M. (Prevailing Eastern Standard Time)** on a **date to be determined**.

PLEASE TAKE FURTHER NOTICE that only those objections made as set forth herein and in accordance with the Case Management Order will be considered by the Bankruptcy Court at the Hearing. If no objections to Groom's Final Fee Application are timely filed and served in accordance with the procedures set forth herein and in the Case Management Order, the Bankruptcy Court may enter an order granting the Final Fee Application without further notice.

Dated: Washington, D.C.  
January 5, 2010

Respectfully submitted,

/s/ Lonie A. Hassel  
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